

ATTACHMENT 2

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

JILL BALLARD, REBECCA VARNO,)	
and MARK POKORNI, on behalf of)	
themselves and the class members)	
described herein,)	Docket 3:18-cv-00121-MEM-
)	MCC
Plaintiffs,)	
)	(Judge Malachy E. Mannion)
v.)	
)	(Magistrate Judge Martin C.
NAVIENT CORPORATION,)	Carlson)
NAVIENT SOLUTIONS, INC., and)	
NAVIENT SOLUTIONS, LLC,)	
)	ELECTRONICALLY FILED
Defendants.)	

I, Anthony Fiorentino, hereby declare pursuant to 28 U.S.C. § 1746 as follows:

1. I am one of the attorneys representing Plaintiffs in the above-captioned matter.
2. On August 18, 2022, I sent an email to Defendants' counsel Lisa Simonetti to follow up on the Parties' Rule 37 Conference involving the class definitions. *See Exhibit I.*
3. On September 3, 2022, I sent an email to Defendants' counsel Lisa Simonetti asking if Navient would state whether the two classes which Defendants conceded were within the scope of the Complaint (Class 1 and 4) could be feasibly searched on Navient's computer database. *See Exhibit J.*

4. On September 3 2022, I received a reply email from Defendants' counsel, Lisa Simonetti, refusing the request. *See Exhibit J.*

5. I declare the foregoing statements to be true under penalty of perjury.

Dated: Wednesday, September 21, 2022

s/Anthony Fiorentino
Anthony Fiorentino